

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LEA BLACK,

Plaintiff,

v.

PRIDE MOBILITY PRODUCTS
CORPORATION, a foreign corporation;
and UNITED SEATING AND MOBILITY,
L.L.C., a foreign corporation, d/b/a
NUMOTION, a foreign corporation;
CAPSTONE MOBILITY GROUP, LLC, a
foreign corporation; MERITS HEALTH
PRODUCTS CO., LTD; MERITS
HEALTH PRODUCTS, INC.; JOHN DOE
COMPANY 1; JOHN DOE COMPANY 2,

Defendants.

No. 2:15-cv-02008-TSZ

LETTERS ROGATORY

TO THE APPROPRIATE JUDICIAL AUTHORITY OF TAIWAN, for International
Judicial Assistance:

A request for international judicial assistance is being made in the interests of justice
for plaintiff, Lea Black.

The United States District Court, District of Western Washington, presents its
compliments to the appropriate Judicial Authority of Taiwan, and requests international

1 judicial assistance in order to obtain service of process, to be used in a civil proceeding that is
2 before this Court in the above captioned matter.

3 Plaintiff Lea Black was severely injured in Seattle, Washington after her Pride Pursuit
4 mobility scooter entered a "freewheel" condition on a hill. The scooter failure may have
5 been caused, among other things, by a failure of a coupler part between the scooter's pinion
6 gear and the motor/brake assembly. The coupler part may have been manufactured and sold
7 by the Merits Health Products, family of companies.

8 Plaintiff Lea Black seeks damages for her injuries, including but not limited to broken
9 bones, loss of appendages, trauma, loss of her living situation, loss of mobility and other
10 injuries resulting in past and future pain and suffering, both physical and mental, and other
11 general damages, together with past and future medical and related expenses, punitive
12 damages if available, and other special damages to be proved at the time of trial.

13 Liability in this case is premised on manufacturer liability under RCW 7.72.030(1)(a),
14 (2), (3); RCW 7.72.030(1)(b), (c); and RCW 7.72.030(3).

15 This Court respectfully requests the assistance described herein as necessary in the
16 interests of justice for Lea Black. The assistance requested is that The Appropriate Judicial
17 Authority of Taiwan effect service of process upon the below named:

18 Merits Health Products Co., Ltd.
19 No. 18 Jingke Rd., T.P.M.T. Park,
20 Nantun District Taichung City,
Taichung 40852, Taiwan

Merits Health Products Co., Ltd.
9 Road 6
Taichung Industrial Park
Taichung, Taiwan

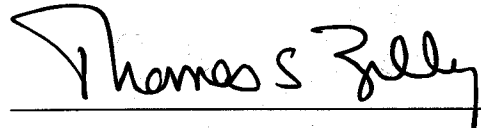
21 by leaving one copy of the attached documents, Summons and Complaint, with Chinese
22 translations thereof, with a director, officer, or other entity authorized to accept service of
23 civil process in the manner prescribed for service of similar documents under the laws of
24 Taiwan.

1 This Court further requests that, after service has been made, the person who serves
2 the documents upon Merits Health Products Co., Ltd., execute a Certificate of Service and
3 return it, together with a copy of the documents served, to this Court at the address below.

4 The United States District Court, Western District of Washington, expresses its
5 willingness to provide similar assistance to Judicial Authorities of Taiwan.

6 Plaintiff's counsel, Schroeter, Goldmark & Bender, 500 Central Building, 810 Third
7 Avenue, Seattle, Washington 98104, as the requesting party, is willing to reimburse the
8 Judicial Authorities of Taiwan for costs incurred in executing this request for judicial
9 assistance.

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11 DATED this 21st day of April, 2017.

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14 Thomas S. Zilly
15 United States District Judge
16 United States District Court
17 Western District of Washington
18 700 Stewart Street
19 Seattle, WA 98101
20 (206) 370-8830
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26

1 Requesting Party:

2 SCHROETER, GOLDMARK & BENDER

3 By: s/Sims Weymuller

4 SIMS WEYMULLER, WSBA #33026

5 By: s/Peter O'Neil

6 PETER O'NEIL, WSBA #28198

7 By: s/Lucas Garrett

8 LUCAS GARRETT, WSBA #38452

9 Counsel for Plaintiff

10 SCHROETER, GOLDMARK & BENDER

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